

UNITED STATES BANKRUPTCY COURT  
NORTHERN DISTRICT OF INDIANA  
SOUTH BEND DIVISION

In Re: )  
            )  
            ) Case No. 12-31863  
Brooke Clarke, )  
            )  
            ) CHAPTER 7  
Debtor         ) JUDGE DEES  
            )

**NOTICE OF MOTION AND OPPORTUNITY TO OBJECT**

On or about **March 26, 2014**, the Counsel for the above-captioned Debtor filed a MOTION TO AVOID LIEN. A copy of the Motion is attached.

**Your rights may be affected.** You should read these papers carefully and discuss them with your attorney. If you do not have an attorney, you may wish to consult one.

If you do not wish the Court to grant the motion, then you or your attorney must:

1. File a written objection to the motion within twenty-one (21) days of the date of this notice of motion (**by May 22, 2014**), which should explain the reasons why you object, with the Clerk of the United States Bankruptcy Court at:

Clerk, United States Bankruptcy Court  
Northern District of Indiana  
Robert K. Rodibaugh United States Bankruptcy Courthouse  
401 S Michigan Street  
South Bend, Indiana 46601-2304

If you mail your objection, you must mail it early enough so that it will be received by the date it is due.

2. You must also mail a copy of your objection to:

Neil A. Waechter  
Law Offices of Neil Waechter, LLC  
716 South Bend Ave.  
South Bend, IN 46617

U.S.Trustee  
One Michiana Square Building  
Room 555  
100 East Wayne Street  
South Bend, IN 46601

If you do not file an objection by the date it is due, the court may grant the relief requested without holding a hearing. If you do file an objection, the court will set the motion for hearing, which you or your attorney will be expected to attend.

Dated: May 1, 2014

/S/ Neil A. Waechter

Neil A. Waechter  
Law Offices of Neil Waechter, LLC  
716 South Bend Ave.  
South Bend, IN 46617  
(574) 360-5429

**CERTIFICATE OF SERVICE**

I CERTIFY THAT ON May 1, 2014, SERVICE OF THE ABOVE AND FOREGOING HAS BEEN SERVED UPON: **SEE BELOW** ELECTRONICALLY OR BY DEPOSITING THE SAME IN THE UNITED STATES MAIL AND WITH SUFFICIENT FIRST CLASS POSTAGE AFFIXED OR BY ELECTRONIC NOTICE WITH CREDITORS REGISTERED AS ELECTRONIC FILERS WITH THE CLERK OF THE US BANKRUPTCY COURT.

/S/ Neil A. Waechter

Neil A. Waechter  
Law Offices of Neil Waechter, LLC  
716 South Bend Ave.  
South Bend, IN 46617  
(574) 360-5429

U.S. TRUSTEE  
ONE MICHIANA SQUARE  
SUITE 555  
100 EAST WAYNE STREET  
SOUTH BEND, IN 46601

US BANKRUPTCY COURT  
ROBERT K. RODIBAUGH  
UNITED STATES BANKRUPTCY  
COURTHOUSE  
401 S. MICHIGAN ST.  
SOUTH BEND, IN 46601

JOSEPH D. BRADLEY  
CHAPTER 7 TRUSTEE  
105 E. JEFFERSON BLVD.  
SUITE 512  
SOUTH BEND, IN 46601

ZAPPIA, ZAPPIA & STIPP  
52582 SR 933 NORTH  
SOUTH BEND, IN 46637

NEIL A. WAECHTER  
ATTORNEY FOR THE DEBTOR  
LAW OFFICES OF NEIL WAECHTER  
716 SOUTH BEND AVE.  
SOUTH BEND, IN 46617

BROOKE CLARK  
4725 BELLEVILLE CIR.  
APT. 4  
SOUTH BEND, IN 46619